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**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF UTAH**

IN RE:	§	
	§	CASE NO. 21-22634
Creston Anderson	§	
Lettie Anderson	§	William T Thurman
Debtor(s)	§	

**MOTION TO EXTEND TIME TO FILE PROOF OF CLAIM
FILED BY CREDITOR AND REQUEST FOR FEES**

Creston Anderson & Lettie Anderson (hereinafter "Debtor"), by and through counsel, and hereby moves this Court pursuant to Bankruptcy Rule 9006 for an order allowing an extension of the deadline to file a proof of claim by Freedom Road Financial ("Creditor"). In support Debtor represents the following:

1. Debtor filed this Chapter 13 Bankruptcy petition on 6/15/2021 ("Petition Date").
2. The deadline for creditors to file a proof of claim was 8/24/2021.
3. The Debtor included their payment to Creditor in their bankruptcy schedules.
4. Creditor failed to timely file a proof of claim for the amount that Debtor owes to Creditor on their property. Debtor filed their proof of claim on December 17, 2021.
5. Therefore, Debtor requests that the deadline be extended to December 17, 2021.
6. Allowing this claim to be filed will not affect feasibility of the current plan, and the payment of the car through the bankruptcy is necessary for an effective reorganization.
7. Counsel is seeking fees associated with this motion of up to \$800.00.

8. Counsel will file a separate application for compensation and provide a copy upon request to any interested parties or creditors.

WHEREFORE, Debtor prays this court Extend the Time to File Proof of Claim on Behalf of Creditor and that attorney fees be awarded in the amount of \$800.00.

Date: January 10, 2022

/s/ Cory B. Cottam
Cory B. Cottam
Attorney for Debtors